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USDC SDNY UNITED STATES DISTRICT COURT DOCUMENT SOUTHERN DISTRICT OF NEW YORK ELECTRONIC DATE FILED: CITY OF WESTLAND POLICE AND FIRE RETIREMENT SYSTEM, Individually and on Behalf of All Others Similarly Situated, Plaintiff, 12 Civ. 0256 (L -against-METLIFE, INC., C. ROBERT HENRIKSON, WILLIAM J. WHEELER, PETER M. CARLSON, STEVEN A. KANDARIAN, and WILLIAM J. MULLANEY, JUDGE KAPLAN'S CHAMBERS Defendants.

## STIPULATION AND [PROPOSED] ORDER EXTENDING TIME TO RESPOND TO COMPLAINT

## TO THE HONORABLE COURT:

IT IS HEREBY STIPULATED AND AGREED, by counsel for the parties listed below, that:

- 1. No defendant in the above-captioned action shall be required to respond to the complaint that was filed in this case on January 12, 2012.
- 2. On or before 45 days following entry of an order appointing lead plaintiff(s) and lead counsel pursuant to the provisions of the Private Securities Litigation Reform Act of 1995, lead plaintiff(s) shall file a consolidated amended complaint, subject to any further Orders of this Court.

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- 3. Defendants shall answer or otherwise respond to the consolidated amended complaint on or before 45 days after the lead plaintiff(s) files a consolidated amended complaint, subject to any further Orders of this Court.
- 4. If defendants file dispositive motions with respect to the consolidated amended complaint, then: (i) lead plaintiff shall serve and file its opposition papers on or before 45 days after defendants file their motions; and (ii) defendants shall serve and file their reply papers on or before 30 days after lead plaintiff files its opposition papers.
- 5. By entering into this stipulation, defendants do not waive any defenses that otherwise could be asserted through a motion pursuant to Fed. R. Civ. P. 12 or otherwise.

Dated: New York, New York February 15, 2012

> ROBBINS, GELLER, RUDMAN & DOWD LLP Samuel H. Rudman (srudman@rgrdlaw.com)

Mario Alba (malba@rgrdlaw.com)

58 South Service Road, Suite 200

Melville, NY 11747 (631) 367-7100

Fax: (631) 367-1173

Attorneys for Plaintiff City of Westland Police and Fire Retirement System

Dated: New York, New York February \_\_\_\_\_, 2012

DEBEVOISE & PLIMPTON LLP

Maeve O'Connor (mloconno@debevoise.com)
Elliot Greenfield (egreenfield@debevoise.com)
Kaitlin T. Farrell (ktfarrel@debevoise.com)

919 Third Avenue

New York, New York 10022

(212) 909-6000 Fax: (212) 909-6836

Attorneys for Defendants Metlife, Inc., C. Robert Henrikson, William J. Wheeler, Peter M. Carlson, Steven A. Kandarian, and William J. Mullaney

SO ORDERED this 27 day of <

THE HONORABLE LEWIS A. KAPLAN

United States District Judge